

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
GREENVILLE DIVISION

IN THE MATTER OF:)	
)	CASE NO.: 19-01298
CAH ACQUISITION COMPANY 7, LLC)	
d/b/a PRAGUE COMMUNITY HOSPITAL)	CHAPTER 11
)	
DEBTOR.)	

**NOTICE OF JOINDER BY RYAN K. STUMPHAUZER AS RECEIVER FOR COMPLETE
BUSINESS SOLUTIONS GROUP, INC. IN MEDIATED SETTLEMENT AGREEMENT**

Ryan K. Stumphauzer, Receiver for Complete Business Solutions Group, Inc. (hereinafter Receiver”), by and through counsel, hereby provides notice that the Receiver agrees to and joins in the Mediated Settlement Agreement as shown in the Chapter 11 Trustee’s Motion For Order to Approve Compromise and Settlement Agreement Pursuant to Rule 9019 (doc #731). In support thereof, the Receiver states as follows:

1. That he was appointed as Receiver for Complete Business Solutions Group, Inc. by Order of the United States District Court for the Southern District of Florida in the action styled “Securities and Exchange Commission vs. Complete Business Solutions Group, Inc., et al.”, Case #20-CIV-81205-RAR (doc #36) (hereinafter “District Court Action”);
2. That the Receiver subsequently filed a Motion to Lift the Litigation Injunction to Authorize Receiver to Enter Into Mediated Settlement Agreement with Chapter 11 Trustee for CAH Acquisition 12, LLC (doc #320) in the District Court Action;
3. That an Order granting the Receiver’s Unopposed Motion, et al. was entered on October 15, 2020 (doc #326) in the District Court Action; and
4. That the Receiver hereby provides notice that he agrees to and joins in the Mediated Settlement Agreement.

WHEREFORE, the Receiver prays the Court as follows:

1. That the Court accept this Notice as being in compliance with and made pursuant to the Motion for Order to Approve Compromise and Settlement Agreement Pursuant to Rule 9019 (doc #731) for the Receiver to agree with and join in the Mediated Settlement Agreement;
2. That the Court grant the Chapter 11 Trustee's Motion for Order to Approve Compromise and Settlement Agreement Pursuant to Rule 9019 (doc #731); and
3. For such other and further relief as the Court may deem just and proper.

This the 19 day of October, 2020.

HUTCHENS LAW FIRM LLP
Attorneys for Receiver for Complete Business Solutions
Group, Inc.

By: 

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CERTIFICATE OF SERVICE

I, as attorney for Receiver for Complete Business Solutions Group, Inc., hereby certify that on the 19 day of October, 2020, I served a copy of the Notice of Joinder by Ryan K. Stumphauzer as Receiver For Complete Business Solutions Group, Inc. by either electronic notice in accordance with the local rules or by depositing the same, enclosed in a postpaid, properly addressed wrapper, in an official depository under the exclusive care and custody of the United States Postal Service, said envelope being addressed as follows:

CAH Acquisition Company 7, LLC
d/b/a Prague Community Hospital
PO Box 953446
Saint Louis, MO 63195

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(by ECF service)

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Waldrep LLP
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Waldrep LLP
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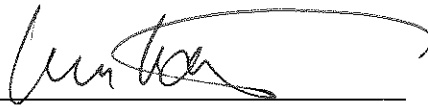
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